



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

April 2, 2001

# **Community Reinvestment Act Performance Evaluation**

**First National Bank of South Miami  
Charter Number: 15000**

**5750 Sunset Drive  
South Miami, FL 33143**

**Office of the Comptroller of the Currency**

**South Florida Field Office  
5757 Blue Lagoon Drive, Suite 200  
Miami, FL 33126**

**NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

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## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated “Satisfactory.”

The following table indicates the performance level of **First National Bank of South Miami** with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank of South Miami Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending activity that reflects an adequate responsiveness to credit needs in its assessment area.
- A substantial majority of originated loans are in its assessment area.
- Adequate geographic distribution of loans in its assessment area.
- An adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- A significant level of qualified investments given available opportunities, competition, size, and capacity and occasionally in a leadership position.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in its assessment area, and it provides a relatively high level of community development services.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate** - Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. The U.S. Census Bureau has established BNAs in conjunction with state agencies.

**Census Tract (CT)** - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the U.S. Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten-year census and an average population of 4,000.

**Community Development (CD)** - Affordable housing for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

**Community Reinvestment Act (CRA)** - The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Full-Scope Review** - Performance under the lending, investment, and service tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

**Geography** - A census tract or a block numbering area delineated by the U.S. Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA)** - The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

**Home Mortgage Loans** - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**Limited-Scope Review** - Performance under the lending, investment, and service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution).

**Low-Income** - Income levels that are less than 50 percent of the median family income.

**Median Family Income (MFI)** - The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Statistical Area (MSA)** - Area defined by the director of the U.S. Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

**Middle-Income** - Income levels that are at least 80 percent and less than 120 percent of the MFI.

**Moderate-Income** - Income levels that are at least 50 percent and less than 80 percent of the MFI.

**Small Loans to Businesses** - Loans with original amounts of \$1 million or less that are: (1) secured by non-farm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

**Small Loans to Farms** - Loans with original amounts of \$500,000 or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

**Tier 1 Capital** - The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income** - Income levels that are 120 percent or more of the MFI.

## Description of Institution

First National Bank of South Miami (FNBSM) is the only community commercial bank headquartered in the affluent and stable City of South Miami, Florida. FNBSM has been in South Miami market area since 1952. The bank operates out of one office with a drive in facility and two onsite automated teller machines (ATMs). In addition, the bank has an offsite ATM at a nearby hospital within the same upper-income geography as the bank's office. Because the bank's lone office is located in the City of South Miami, the majority of the bank's lending and deposit taking activities are concentrated within this immediate area.

FNBSM is wholly owned by a one-bank holding company, First Miami Bancorp Inc. (formed in 1992) with the Wirtz-MacArthur Family of Chicago, Illinois maintaining 71% of stock ownership of the company. First Miami Bancorp, Inc is also headquartered in South Miami with its only asset FNBSM. The bank is an intrastate bank, which has one statutory subsidiary, First National South Miami Safe Deposit Company that operates out of the bank's office. The subsidiary is a department of the bank whose main function is to provide safe deposit box services to consumers and businesses in the banks market area. The bank also has one of the few full service trust facilities in the area. The subsidiaries do not influence the bank's capacity to lend or invest in the community.

As of December 31, 2000, the bank reported total assets of \$276 million. The major loan categories of the bank's \$82 million loan portfolio were as follows: 57% to individuals; 15% for commercial real estate; 16% for commercial and industrial; and 12% for 1-4 family residential. The percent of the bank's total assets represented by net loans was 30% compared to 58% for seven (7) similar size peer banks in its assessment area. Tier 1 Leverage Capital was 12.30% at year-end 2000, compared to 9.69% for peer banks.

FNBSM's primary focus is on consumer lending, specifically indirect car loans, and small loans to businesses. The bank just started HMDA lending during 1999 and the late start into this type of lending in a very competitive mortgage market is reflected in its overall market share. The bank's loan-to-deposit (LTD) ratio is significantly below the 72% LTD ratio for local peer banks. However, the lending activity continues to increase and their LTD ratio was 43% at year-end 2000.

There are no legal, financial, or other impediments, which would hamper the bank's ability to help meet the credit needs of its community. The bank's rating at its preceding CRA examination, dated March 15, 1999 was "Needs to Improve." During 1997, the bank began an indirect auto-lending program throughout its assessment area to improve its CRA record. Indirect auto loans are offered through three dealerships in MSA 5000.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

With the exception of community development (CD) loans, the evaluation period for the Lending Test is January 1, 1999 through December 31, 2000. For CD loans, the Investment Test, and the Service Test, the evaluation period is March 15, 1999 through April 2, 2001.

For the lending test, FNBSM's origination/purchase of home mortgage loans, small loans to businesses and CD loans were evaluated. At the bank's request, consumer loans were also reviewed. Small loans to farms were not evaluated because the bank did not originate/purchase any small farm loans during the evaluation period.

### Data Integrity

As part of the CRA evaluation, FNBSM's publicly filed information on home mortgage loans, small loans to businesses, and consumer loans was tested for accuracy. The test included an evaluation of FNBSM's processes to ensure that data was reliable. No errors were noted in 1999 or 2000 HMDA, small business, or consumer loan data. Data used to reach conclusions regarding the bank's CRA performance at this evaluation was considered reliable.

CD loans, investments and services submitted by FNBSM management were verified to ensure that they met the regulatory definition for community development. All CD loans, investments, and services submitted by FNBSM met the definition or purpose of community development.

### Selection of Areas for Full-Scope Review

FNBSM has designated one assessment area; the Miami-Dade MSA. The MSA represents FNBSM's major market and contains 100% of the bank's deposits and 91% of the entire lending activity over the evaluation period.

### Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. Small business loans were weighted more heavily than home mortgage loans due to the bank's focus on business lending. The bank originated almost three times the number of small business loans than home mortgage loans during the evaluation period. HMDA lending received less weight and had little impact on the bank's overall rating. Consumer loans were of secondary importance because they were not identified as a primary credit need within the bank's AA. Due to the lack of any loans, small farm loans were not evaluated.

### Other

We conducted a community contact with a non-profit organization which fosters self employment through business loans, business training, and networking support for low- and moderate-income individuals who want to achieve better housing, education, and healthcare for themselves and their families. We also reviewed seven previous community contacts prepared by representatives of other

bank regulatory agencies. The Miami-Dade MSA has identified activities in the following three categories of needs: economic development; job opportunities; and job training. It is expected that business lending will continue to be a primary need for funding start-up businesses. In addition, the need exists for affordable multi-family and single family homes. Please refer to Appendix B: Market Profiles section for additional information.

The City of South Miami has a specially designated South Miami Community Redevelopment Area (SMCRA) under the Florida Community Redevelopment Act. According to the 1990 census data, this area within South Miami has 38% of the households below poverty level. The SMCRA is located within middle-income census tract #0076.03, which is adjacent to census tract #0076.04, the upper-income census tract in which the bank's only office is located. The SMCRA plan is a program for assisting low- and moderate-income individuals and presents an opportunity for local financial institutions to play a significant role in the rehabilitation of this area. Identified SMCRA credit needs are as follows: major rehabilitation for residential and commercial properties and soft costs to start businesses, mortgage loans, and guarantee programs to purchase homes.

## Fair Lending Review

An analysis of 1999 and 2000 public comments, consumer complaint information, 1999 HMDA and Small Business lending data was performed according to the OCC's risk based fair lending approach. Based on its analysis of information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending examination was performed in 1999.

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "Low-Satisfactory." Based on the full-scope review, the bank's performance in the Miami-Dade MSA is adequate.

#### Lending Activity

Refer to Table 1 in appendix C for the facts and data used to evaluate the bank's lending activity.

Lending activity reflects an adequate responsiveness to the credit needs in FNBSM's AA. In the Miami-Dade MSA, approximately 7% of the number of loans originated or purchased during the evaluation period were small loans to businesses. Home mortgage loans comprised a very low percentage of just 2%. The majority, representing 91% of the number of loans, were consumer loans. The bank did not make any small loans to farms, as agriculture is not a primary business line of FNBSM.

The bank's level of lending activity is adequate given its deposit market share. FDIC data as of June 2000 shows that FNBSM had a 4/10ths of 1% deposit market share for Miami-Dade MSA. The bank's overall market share of small business loans in Miami-Dade MSA, at 4/10ths of 1% approximates the bank's deposit market share.

Based on 1999 HMDA aggregate data, FNBSM is ranked 209<sup>th</sup> in overall volume of HMDA lending with a market share of 4/100ths of 1%, which is lower than the bank's deposit market share. During the evaluation period FNBSM originated 75 home mortgage loans totaling \$4.3 million in the Miami-Dade MSA. However, there are over 70 financial institutions with over 470 branches making home mortgage loans in the MSA and reflects the overall competitive market in the MSA.

#### Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the AA is adequate. The geographic distribution of home mortgage loans is adequate. The geographic distribution of small loans to businesses is adequate. The geographic distribution to consumer loans is adequate. There were no conspicuous gaps in the bank's lending.

We considered the following factors in assessing the bank's lending performance in low-income geographies for HMDA lending. The single low-income geography adjacent to the bank is made up entirely by the University of Miami, where there is no housing stock available. Other low-income geographies within the AA are not close to the bank's office. These tracts have a very high level of households below the poverty level, making home ownership difficult.

Location and poverty level contribute to the lower performance in moderate-income geographies. FNBSM's only office is not close to moderate-income geographies in the AA to adequately serve these communities. In addition, the level of households below poverty level in moderate-income geographies

is in excess of 28%. Efforts to enhance HMDA lending in moderate-income areas included originating four loans in a moderate-income census tract under a Habitat for Humanity (HFH) lending arrangement.

### ***Home Mortgage Loans***

Refer to Tables 2, 3 and 4 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans is adequate given the available opportunities, size and capacity of the bank, as described above. Because of the very low level of home purchase loans and home refinance loans a meaningful distribution analysis could not be performed and will not be discussed.

The overall geographic distribution of *home improvement loans* is adequate. The bank's percent of home improvement loans in low-income tracts is somewhat lower than the percent of owner-occupied units in these tracts. The percent of home improvement loans to moderate-income tracts is lower than the percent of owner-occupied units in moderate-income tracts. Because of the low number of home improvement loans (60) originated, market share comparison is not meaningful and not discussed for home improvement lending within the AA.

### ***Small Loans to Businesses***

Refer to Table 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of *small loans to businesses* is adequate. The bank's percent of small loans to businesses in low-income tracts equals the percent of business in these tracts. The percent of small loans to businesses is lower than the businesses in moderate-income tracts. The bank's market share in low-income tracts equals its overall market share. The bank's market share in moderate-income tracts equals its overall market share.

### ***Small Loans to Farms***

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

We did not analyze FNBSM's small loans to farms lending performance. The bank did not originate small loans to farms during the evaluation period.

### ***Consumer Loans***

Refer to Table 14 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The overall geographic distribution of *consumer loans* is adequate. The bank's percent of consumer loans in low-income tracts is lower than the percent of households in these tracts. The percent of consumer loans to households is somewhat lower than the percent of households in moderate-income tracts. There is no market share data for consumer loans.

## **Lending Gap Analysis**

Reports and maps detailing FNBNM's lending activity over the evaluation period for home mortgage loans, small loans to businesses, and consumer loans were reviewed to identify gaps in the geographic distribution of these loans, focusing on low- and moderate-income geographies. No unexplained or conspicuous gaps were identified.

### ***Inside/Outside Ratio***

A substantial majority of loans are made in the bank's AA. Ninety-one percent of all loans originated/purchased by FNBSM over the evaluation period were within the bank's AA. Ninety-six percent of the bank's home mortgage loans, 96% of the small loans to businesses, and 91% of their consumer loans were within its assessment areas. This performance had a positive effect on the bank's overall geographic distribution.

## **Distribution of Loans by Income Level of the Borrower**

The overall distribution of loans by income in the AA is adequate. The distribution of home mortgage loans by borrower is adequate. The distribution of small loans to businesses by revenue size is adequate. The distribution of consumer loans by borrower is good.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. The number of households that live below poverty level in the AA is 17.62%, according to 1990 Census data. Furthermore, within low-income households in the AA, 67% live below poverty levels making it difficult for a large number to afford and maintain a home. Due to the very low level of home purchase loans and home refinance loans a meaningful income analysis could not be performed and will not be discussed.

### ***Home Mortgage Loans***

Refer to Tables 7, 8, and 9 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income level is adequate.

The distribution of *home improvement loans* by borrower income level is adequate. The bank's percent of home improvement loans to low-income borrowers is lower than the percent of low-income families residing in the AA. The bank's percent of home improvement loans to moderate-income borrowers is somewhat lower than the distribution of moderate-income families residing in the AA. Refer to the comment above for demographic information on the poverty level. Because of the low number of home improvement loans (60) originated, market share comparison is not meaningful and not discussed for home improvement lending within the AA.

### ***Small Loans to Businesses***

Refer to Table 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of small loans to businesses is adequate. FNBSM's percentage of small loans to small businesses (businesses with annual revenues \$1 million or less) is near to the percentage of small businesses in the AA. Their market share of small loans to small businesses exceeds their overall market share of small loans to all businesses. A substantial majority of the bank's loans to small businesses are for amounts of \$100 thousand or less.

### ***Small Loans to Farms***

Refer to Table 11 in the appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

We did not analyze FNBSM's small loans to farms lending performance. The bank did not originate small loans to farms during the evaluation period.

### ***Consumer Loans***

Refer to Table 14 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of *consumer loans* is good. The bank's percent of consumer loans to low-income borrowers is somewhat lower than the percent of households in the AA. The bank's percent of consumer loans to moderate-income borrowers significantly exceeds the distribution of moderate-income households in the AA. There is no market share data for consumer loans.

## **Community Development Lending**

Refer to Table 1 in appendix C for the facts and data used to evaluate the bank's level of community development lending.

The bank's Community Development (CD) lending level had a neutral effect on the bank's lending test. During the evaluation period, the bank made 5 qualified CD loans totaling \$570 thousand that benefited the AA. The amount was approximately 1.6% of the bank's Tier 1 capital. Primarily, FNBSM extended 4 loans for \$555 thousand to a nonprofit organization that provides community health related services targeted to low- and moderate-income individuals. In addition to the health-related services, other activities the organization performs include job placement, housing, and training for low- and moderate-income individuals in the MSA who have a history of emotional problems. Two of the loans were short-term working capital lines to carry delay of funds received from state and federal funding sources. The other two loans are commercial mortgages, one is a multifamily residential property which houses the low-income individuals, and the other loan was a commercial mortgage to convert a warehouse property into classrooms for these individuals to receive pre-employment skills assistance. The loans were not considered complex or innovative.

## **Product Innovation and Flexibility**

Product innovation and flexibility had a neutral impact on the Lending Test conclusions for the AA. The bank did not use innovative or flexible lending products during the evaluation period.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "High Satisfactory." Based on the full-scope review, the bank's performance in the Miami-Dade MSA is good given available opportunities, size and capacity.

We determined through community contacts and the bank's own internal research that there are many opportunities, although competition is keen for qualified investments throughout the bank's assessment area. In a few instances, the bank has taken a leadership role in assisting in the solicitation of grants and investments from other financial institutions. The specific needs and opportunities for investments in the AA are further discussed within the Scope of Evaluation section of this report. Within the AA, FNBSM participated in qualified grants when available that focused on organizations that were in their immediate market area. FNBSM took advantage of purchasing mortgage-backed securities whose underlying collateral was qualifying mortgages to low- and moderate-income borrowers. None of the investments made during the evaluation period are considered innovative or complex and they primarily responded to the affordable home mortgage needs of low- and moderate-income individuals.

Refer to Table 12 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

#### Current Period Investments:

In the Miami-Dade MSA, FNBSM purchased 6 Community Development (CD) investments that totaled \$1.3 million. This volume of investments represents 3.7% of the bank's level of Tier 1 capital and represents 100% of the total dollar volume of the bank's qualified investments. The investments are mortgage-backed securities issued by the Federal Home Loan Mortgage Corporation, the underlying collateral for these securities consisted of mortgage loans made to 18 low- and moderate-income borrowers in the MSA.

#### Current Period Grants and Donations:

FNBSM contributed \$50 thousand to 18 nonprofit organizations in the Miami-Dade MSA. The donations and grants were to organizations that had as their primary missions affordable housing for low- and moderate-income individuals, community services targeted to low- and moderate-income individuals, and activities that promote economic development by financing businesses that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less.

Donations and grants include the bank's active involvement in these two nonprofit organizations:

During the assessment period FNBSM granted \$10.5 thousand to a nonprofit organization established by the Homeless Committee of the Greater Miami Chamber of Commerce. The primary mission of the organization is to provide affordable housing and community services to low- and moderate-income homeless individuals and families. Through their mission they develop permanent supportive housing and maximize the self-sufficiency of formerly homeless adults and families in Miami-Dade County. The organization is primarily a housing developer that is exclusively devoted

to developing supportive housing for the formerly homeless and those who are at risk of homelessness, which is different from other nonprofit organizations.

During the assessment period, FNBSM granted \$5 thousand to a private, nonprofit organization. This organization fosters self-employment through business loans, business training, and networking support for low- and moderate-income persons who want to achieve better housing, education and healthcare for themselves and their families. In working with the SBA's Development Company programs, each grant of \$5 thousand allows it to obtain \$33,000 in SBA funding. They then use the funding to make loans ranging from \$500 to \$25,000 to start-ups and small businesses without credit records. Through its unique learning structure, the organization's staff, teams of volunteer bankers, and other financial specialists provide advice to borrowers on accounting, taxes and the other financial aspects of running a business.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Miami-Dade MSA is adequate.

#### Retail Banking Services

Refer to Table 13 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AA. The bank operates out of one office in an upper-income geography, which provides ready access to residents in the vicinity of South Miami. The bank's location is within close proximity (less than 1 mile) to the South Miami Community Reinvestment Area (SMCRA) and the low-income census tract that includes the University of Miami. The low- and moderate-income individuals located in the SMCRA have easy access to the bank and its ATM network. In addition, FNBSM offers a free checking account product with no minimum balance required to the students of the University of Miami.

The bank has four automated teller machines (ATM), three of which are located onsite. The fourth ATM is located in a hospital in the same upper income census tract that borders the SMCRA. Bank customers can use FNBSM's ATM network or the Presto network with either the bank's proprietary ATM card or Visa Check card at no cost. FNBSM cards are also accepted for point-of-sale (POS) transactions without any service charges. Due to the lack of information on card and POS usage we were unable to determine the effectiveness of these products as alternative delivery systems.

The bank did not open or close any branches during this two-year assessment period. To this extent, FNBSM's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. Its services, including business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and low- and moderate-income individuals. Banking hours and services are provided Monday through Friday and are supplemented by Saturday drive-in hours at the South Miami office.

#### Community Development Services

FNBSM's performance providing Community Development (CD) services is good. Given the available opportunities, FNBSM and its officers provide a relatively high level of CD services, sometimes in a leadership role that include two bank officers serving as Directors of Finance Committees for two local CD organizations. The types of services provided are not innovative in nature, but are responsive to the needs of the community. Four senior officers have provided financial services to five community development organizations. The following is a list of the financial services that were provided to the qualified CD organizations during this evaluation period:

- In October of 2000, the bank sponsored consumer credit counseling seminars at a local church located in the South Miami Community Reinvestment Area. FNBSM loan officers attended to assist

residents in applying for home improvement loans. Through the bank's efforts the seminar also included representatives from other non-bank entities who discussed multifamily rehabilitation and micro-business loan programs.

- **Carrfour Corporation** - Provides construction and maintenance housing for the homeless. The primary mission of the Carrfour Corporation is to provide affordable housing and community services to low- and moderate-income homeless individuals and families. Through their mission Carrfour develops permanent supportive housing and maximizes the self-sufficiency of formerly homeless adults and families in Miami-Dade County. The bank's business development officer works on the board and finance committee.
- **Habitat for Humanity of Greater Miami (HFH)** - A nonprofit organization that builds home for low-income families. HFH works to eliminate poverty in housing by depending on volunteer labor and sweat equity from the selected homeowner. Over the evaluation period, the bank has extended \$400 thousand in residential loans to HFH to purchase and refurbish homes for low-income households within South Miami. These residential loans were included in the bank's home mortgage loan analysis. A Vice President and lending officer of the bank is a member of the organizations Development Committee.
- **Working Capital of Florida/Partners for Self-Employment, Inc.** - Working Capital Florida is a private, nonprofit organization which fosters self employment through business loans, business training, and networking support for low- and moderate-income persons who want to achieve better housing, education, and healthcare for themselves and their families. Working Capital Florida/Partners for Self-Employment, Inc. is a Community Development Financial Institution working with the Small Business Agency. FNBSM's Senior Vice President of Lending is a Loan Committee member who is involved in the organizations grant process and training.
- **Fellowship House** - This organization provides community services targeted to low- and moderate-income individuals with emotional problems. Through the help of Fellowship House employees and volunteers individuals are provided with housing, job training, and job placement. The bank's president sits on the board of this organization. As a member of the board, he is involved in fund-raising activities.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 1/1/1999 to 12/31/2000 Investment and Service Tests and CD Loans: 3/15/1999 to 4/2/2001	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank of South Miami (FNBSM) South Miami, Florida	Residential Home Purchases Home Improvement Residential Refinance Small Business Consumer	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Miami-Dade MSA #5000	Full-Scope	NA

# Appendix B: Market Profiles for Full-Scope Areas

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### Market Profiles for Areas Receiving Full-Scope Reviews

Miami-Dade MSA .....	B-2
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## Miami-Dade

Demographic Information for Full-Scope Area: Miami-Dade MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	267	13%	21%	36%	29%	1%
Population by Geography	1,937,094	9%	19%	40%	32%	0%
Owner-Occupied Housing by Geography	376,006	3%	13%	41%	43%	0%
Businesses by Geography	94,349	10%	19%	31%	40%	0%
Farms by Geography	1,682	3%	13%	36%	48%	0%
Family Distribution by Income Level	485,213	23%	16%	19%	42%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	192,734	15%	28%	40%	17%	0%
Median Family Income		Median Housing Value		= \$100,570		
HUD Adjusted Median Family Income for 2001	= \$33,980	Unemployment Rate		= 6%		
Households Below the Poverty Level	= 18%					

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census, and 2001 HUD updated MFI.

FNBSM's Miami-Dade assessment area consists of the entire Miami-Dade MSA. The bank's only office is located in South Miami a small incorporated city in the southeastern portion of the MSA. In addition to the one banking office, the bank has 3 ATMs located in close proximity to its office. As of June 30, 2000, 100% of the bank's deposits were derived from the MSA, with the majority of the deposits from consumers living near the bank, and businesses within South Miami. Over the evaluation period, 96% of the bank's home mortgage loans and 92% of the small business and consumer loans made were derived from the MSA. The bank's primary focus is providing loans and services to small businesses and consumers primarily through its indirect car loan product.

Throughout the past decade, Greater Miami's work force has grown younger and more culturally diverse. This work force is particularly well suited to employment in today's internationally oriented industries. Almost three-quarters of the Miami-Dade labor force are in the following segments of employment: administrative support (21%); government (14%); professional (13.8%); operators, fabricators, & laborers (12.5%); and marketing and sales (11.3%). Employment in the Miami-Dade MSA has risen from 888 thousand in 1990 to 984 thousand in 1999, an increase of 10.8%. Unemployment for 1999 was 5.8%.

The 2000 census reports Miami-Dade MSA's population at 2.3 million, which is a 16.3% increase from the 1990 census. Of that number, more than one million reside in unincorporated Miami-Dade County with the balance residing in the county's 29 municipalities. The City of Miami is the largest with a population of nearly 400,000, followed by Hialeah, Miami Beach, North Miami and Coral Gables.

Miami-Dade County's economy is diverse. Major industries include merchandise trade with Latin America, construction, tourism, and services. Known as the major international trading hub of the Americas, Greater Miami's business community, people, neighborhoods, schools and architecture all exhibit a cosmopolitan character. The proximity of the Caribbean, Central and South America plus superior seaport and airport capabilities provide this area with a distinct advantage as a global trading center.

Competition for lending is strong within the MSA. There are numerous community and regional bank offices as well as offices of savings and loan associations and other financial institutions such as credit unions and brokerage firms. The large regional banks, along with national mortgage companies, are the main home mortgage lenders in the county. Market data for 1999 shows the top ten mortgage lenders in the county, with a 37% market share, were subsidiaries of some of the largest banks in the nation. Whereas, FNBSM 1999 mortgage originations ranked 210th with a .04% market share. FNBSM fared better with small business lending ranking 21st with a .41% market share. Despite the stronger showing in small business lending, during 1999 all lenders originated 35 thousand loans totaling \$1.3 trillion.

There are many opportunities for community development lending, investments, and services throughout the Miami-Dade MSA. However, larger institutions in the MSA are quite competitive for the qualified investments that are available. Community development opportunities include working with, and purchasing bonds issued by government organizations that finance affordable housing for low- and moderate-income individuals. Types of community development investments available in the Miami-Dade MSA include, but are not limited to, bond and tax credits for low-income housing. There are opportunities contribute and donate to qualified non-profit organizations whose missions are to provide affordable housing, community services, and economic development.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.

- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.
- Table 13. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.
- Table 14. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

**Table 1. Lending Volume**

LENDING VOLUME		State: Florida				Evaluation Period: January 1, 1999 TO December 31, 2000						
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA**
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Miami-Dade MSA	100%	75	4,284	289	14,331	0	0	5	570	369	19,185	100%
Limited-Review:												
None												

(\*) Rated area refers to either the state or multistate MSA rating area.

(\*\*) The evaluation period for Community Development Loans is March 15, 1999 to April 2, 2001.

(\*\*\*) Deposit data as of June 30, 2000. Rated area refers to either the state or multistate MSA rating area.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		State: Florida				Evaluation Period: January 1, 1999 TO December 31, 2000									
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Miami-Dade MSA	10	100%	3%	0%	13%	40%	41%	60%	43%	0%	<1	0	<1	<1	0
Limited-Review:															
None															

(\*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

(\*\*) Percentage of Owner-Occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 2000								
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full-Review:															
Miami-Dade MSA	60	100%	3%	2%	13%	5%	41%	8%	43%	85%	<1	<1	<1	<1	1
Limited-Review:															
None															

(\*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

(\*\*) Percentage of Owner-Occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 2000								
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full-Review:															
Miami-Dade MSA	3	100%	3%	0%	13%	0%	41%	0%	43%	100%	0	0	0	0	0
Limited-Review:															
None															

(\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

(\*\*) Percentage of Owner-Occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES												State: Florida		Evaluation Period: January 1, 1999 TO December 31, 2000				
MSA/Assessment Area:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Miami-Dade MSA	289	100%	10%	10%	19%	5%	31%	13%	40%	72%	<1	<1	<1	<1	<1			
Limited-Review:																		
None																		

(\*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS												State: Florida		Evaluation Period: January 1, 1999 TO December 31, 2000				
MSA/Assessment Area:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Miami-Dade MSA	0	0	3%	0%	13%	0%	36%	0%	48%	0%	0	0	0	0	0			
Limited-Review:																		
None																		

(\*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 2000								
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families**	% BANK Loans** *	% of Families**	% BANK Loans** *	% of Families**	% BANK Loans***	% of Families**	% BANK Loans** *	Overa ll	Low	Mod	Mid	Upp
Full-Review:															
Miami-Dade MSA	10	100%	23%	0%	16%	0%	19%	0%	42%	100%	0	0	0	0	0
Limited-Review:															
None															

(\*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.  
 (\*\*) Percentage of Families is based on 1990 Census information.  
 (\*\*\*) As a percentage of loans with borrower income information available. No information was available for 80% of loans originated and purchased by the bank.  
 (\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 2000								
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families**	% BANK Loans** *	% of Families**	% BANK Loans** *	% of Families**	% BANK Loans***	% of Families**	% BANK Loans** *	Overa ll	Low	Mod	Mid	Upp
Full-Review:															
Miami-Dade MSA	60	100%	23%	9%	16%	9%	19%	15%	42%	67%	<1	<1	<1	<1	<1
Limited-Review:															
None															

(\*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.  
 (\*\*) Percentage of Families is based on 1990 Census information.  
 (\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.  
 (\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 2000								
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families**	% BANK Loans**	% of Families**	% BANK Loans**	% of Families**	% BANK Loans***	% of Families**	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp
Full-Review:															
Miami-Dade MSA	3	100%	23%	33%	16%	33%	19%	0%	42%	34%	0	0	0	0	0
Limited-Review:															
None															

(\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 2000			
	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****		
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less	
Full-Review:										
Miami-Dade MSA	289	100%	85%	73%	90%	8%	2%	<1	1	

(\*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

(\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(\*\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0% of small loans to businesses originated and purchased by the bank.

(\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		State: Florida		Evaluation Period: January 1, 1999 TO December 31, 2000					
	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Miami-Dade MSA	0	0%	94%	0%	0%	0%	0%	0	0
Limited-Review:									
None									

(\*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.  
 (\*\*) Farms with revenues of \$1 million or less as a percentage of all businesses.  
 (\*\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0% of small loans to businesses originated and purchased by the bank.  
 (\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		State: Florida		Evaluation Period: March 15, 1999 TO April 2, 2001					
MA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
Miami-Dade MSA	0	0	24	1,364	24	1,364	100%	0	0
Limited-Review:									
None									

(\*) Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.  
 (\*\*) Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										State: Florida		Evaluation Period: March 15, 1999 TO April 2, 2001					
MSA/Assessment Area:	Deposits		Branches					Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Review:																	
Miami-Dade MSA	100%	1	100%	0	0	0	100%	0	0	0	0	0	0	9%	19%	40%	32%
Limited-Review:																	
None																	

**Table 14. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)**

Geographic and Borrower Distribution: CONSUMER LOANS										State: Florida		Evaluation Period: January 1, 1999 TO December 31, 2000						
MSA/Assessment Area:	Total Consumer Loans		Geographic Distribution								Borrower Distribution							
			Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total**	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans
Full-Review:																		
Miami-Dade MSA	3,588	100%	9%	3%	20%	11%	38%	34%	33%	52%	26%	19%	15%	28%	19%	27%	40%	26%
Limited-Review:																		
None																		

(\*) Percentage of Households (Hhlds) is based on 1990 Census information.

(\*\*) Consumer loans originated and purchased in the MSA/AA as a percentage of all consumer loans originated and purchased in the rated area.

